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August 17, 2021

Via ECF

Honorable Ronnie Abrams
United State District Court
Southern District of New York
40 Foley Square, Room 2203
New York, New York 10007

Re: *Sugley Flores, proposed administratrix of the Estate of the Infant, M.F., deceased, Sugely Flores individually, Yvelise Beltre, proposed administratrix of the Estate of the Infant, I.M., deceased, Oscar Moronta, and Yvelise individually v. The City of New York, et. al.*
Case No. 21-cv-5861

Dear Hon. Abrams:

This firm represents Defendant National Railroad Passenger Corporation (Amtrak) in the above-referenced matter. By way of this letter, the parties jointly and respectfully request a thirty (30) day adjournment of the initial conference currently scheduled for August 27, 2021, as well as a commensurate extension of time to file a proposed Civil Case Management Plan and Scheduling Order that is currently due on August 20, 2021.

The parties are further investigating the claims in this matter and require additional time to determine the appropriate balance of discovery needed and necessary time to complete same. Accordingly, in the interest of preserving judicial resources, the parties request a thirty (30) day adjournment of the initial conference to September 27, 2021, or such other date as the Court directs. The parties further request a commensurate extension of the deadline to file the joint proposed case management plan, to September 20, 2021, or seven (7) days prior to any initial conference date as set by the Court.

This is the first request for an adjournment of the initial conference. All parties consent to this request.

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Thank you for your attention to this matter. Should the Court require additional information, please contact the undersigned.

Respectfully,

/s/ Shayna Bryan

Shayna Bryan

cc: Michael Roitman, Esq. (*via* ECF)
Julee Kelly, Esq. (*via* ECF)

Application granted. The status conference is accordingly adjourned until September 30, 2021 at 3:00 pm. The parties shall submit a joint letter in advance of this conference no later than September 23, 2021.

SO ORDERED.



Hon. Ronnie Abrams
08/18/2021